



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 6, 1990

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Ms. Priscilla Young
American Petroleum Institute
1220 L Street, NW
Washington, DC

Dear Ms. Young:

Thank you for your letter of January 12, 1990, regarding the use of manual tank gauging as the sole leak detection method for tank of 1000 nominal capacity. We have carefully reviewed the calculations you submitted and have concluded that, when conducted in accordance with the procedures described in the attachment, manual tank gauging meets the performance standards in 40 CFR 280.43(h)(1) for tanks of nominal capacity of 1000 gallons or less. Thus, for tanks of this size manual tank gauging can be used as the sole means of meeting the leak detection requirements.

If you have any questions regarding this response please give me a call.

Sincerely,

/s/

Ronald Brand, Director
Office of Underground Storage Tanks

Attachment

Requirements for manual tank gauging for 1000 gallon tanks

In order to meet the performance standard for "other methods" in 40 CFR 280.43(h)(1), manual tank gauging must meet the following requirements:

1. Tank liquid level measurements are taken at the beginning and the ending of a time period during which no liquid is added to or removed from the tank. The appropriate time period is listed in the chart below;
2. Level measurements are based on an average of two consecutive stick readings at both the beginning and the ending of the period.
3. The equipment used is capable of measuring the level of product over the full range of the tank's height to the nearest one-eighth of an inch;
4. Testing must be conducted at least once a week and four weekly results must be averaged to obtain a monthly result. A leak is suspected and subject to the requirements of Subpart E if the variation between beginning and ending measurements exceeds the weekly or monthly standards in the following table:

Nominal tank capacity and dimensions	Weekly standard (one test)	Monthly standard (average of four tests)	Minimum test duration
1000 gallons (64" x 73")	9 gallons	4 gallons	44 hours
1000 gallons (48" x 128")	12 gallons	6 gallons	58 hours